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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANNE EVANS,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES,
LLC; BANK OF AMERICA, N.A.;
CITIGROUP, INC; JPMORGAN CHASE
BANK, N.A.; AND CAPITAL ONE BANK,
N.A.,

Defendants.

Case No. 2:23-cv-00237-MMD-DJA

**UNOPPOSED MOTION TO EXTEND
TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

Defendants Bank of America N.A. ("BANA") by and through its undersigned counsel of record, hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff's Complaint (First Request):

On February 14, 2023, Plaintiff filed his Complaint [ECF No. 1]. The Summons to Defendants was issued on February 14, 2023 [ECF No. 4] and purportedly served on February 16, 2023. BANA had 21 days from when the summons was served to file its response to the Complaint, which made the current deadline March 9, 2023.

BANA's counsel is still investigating the allegations raised in Plaintiff's Complaint. Further, Plaintiff and BANA have discussed extending the deadline 30-days for BANA to respond to the Complaint, in order to explore early resolution opportunities.

1 On March 8, 2023, BANA received approval of a 30-day extension to respond to the
2 Complaint from Plaintiff's counsel, which would make the response due April 10, 2023.

3 Based upon the foregoing, BANA respectfully requests that the Court extend the deadline
4 for BANA to file its response to Plaintiff's Complaint to April 10, 2023. This is the first request
5 for extension of time for BANA to respond to Plaintiff's Complaint. The extension is requested in
6 good faith and is not for purposes of delay or prejudice to any other party.

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8 Dated this 9th day of March, 2023.

9 WRIGHT, FINLAY & ZAK, LLP

10 /s/ Jory C. Garabedian

11 Darren T. Brenner, Esq.
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16 Las Vegas, Nevada 89117
17 *Attorneys for Bank of America, N.A.*

18 **IT IS SO ORDERED:**

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20 _____
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: March 10, 2023
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 9, 2023, and pursuant to Fed. R. Civ. P. 5(b), I served via the CM/ECF electronic filing system a true and correct copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** to the parties below:

George Haines	Ghaines@freedomlegalteam.com
Gerardo Avalos	gavalos@freedomlegalteam.com

/s/ Tonya Sessions
An employee of Wright Finlay & Zak LLP